

Paris, 9 September 2019

*For the attention of national Ministries / authorities in charge of transposing / implementing the revised Waste Framework Directive 2008/98/EC*

# SPACE INDUSTRY POSITION REGARDING ARTICLE 9 OF THE REVISED WASTE FRAMEWORK DIRECTIVE 2008/98/EC

## **Applicability of Article 9 (1) (i) and (ii) of the revised Waste Framework Directive 2008/98/EC to equipment designed to be sent into space and related means of transport which do not result in waste on the EU territory**

The European Space Industry, represented by ASD-EUROSPACE – collaborating with European and national space agencies – seeks your support on the transposition / implementation of Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste (hereafter also referred to as the revised Waste Framework Directive/WFD).

### **NOTIFICATION AND ECHA DATABASE PURSUANT TO ARTICLE 9 OF THE REVISED WFD**

Article 9 titled ***‘Prevention of waste’*** of the revised WFD foresees as one of the measures to be taken by the Member States *‘to prevent waste generation’* that **any supplier of an article** provides the information pursuant to Article 33 (1) of Regulation (EC) No 1907/2006 (REACH) to the European Chemicals Agency (ECHA) as from 5 January 2021 (point (i) of paragraph 1). ECHA shall establish a database for the data to be submitted pursuant to this provision by 5 January 2020 and *‘provide access to that database **to waste treatment operators**’* (paragraph 2; *emphasis added*).

Thus, this new notification duty goes beyond the already existing information obligations under REACH Articles 33 and 7(2), **with special regard to the waste stage**. According to the European Commission’s DG Environment the information made available to the waste treatment operators via the database *“has to be **useful for the waste treatment phase** of the article’s lifecycle and **enable the identification and effective treatment of waste** containing SVHC<sup>1</sup> [...]”*; therefore the Commission requires a wide scope of “minimum available information” relating to the identification of the article and the SVHC (name, concentration range and location) which the supplier has to communicate to ECHA,<sup>2</sup> while only the name of the SVHC may be sufficient under REACH Article 33(1).

The key underlying objective of the revised WFD is to promote the EU’s **Circular Economy** policy.

---

<sup>1</sup> Substances of Very High Concern, as defined in REACH Article 57.

<sup>2</sup> See European Commission “Non-paper on the implementation of articles 9(1)(i) and 9(2) of the revised Waste Framework Directive 2008/98/EC”, Ref. Ares(2019)3936110-20/06/2019; enclosed as [Annex 3](#).

**APPLICABILITY OF ARTICLE 9 OF THE REVISED WFD TO NON-WASTE HARDWARE**

The Space Sector as a producer of very complex space systems (launch vehicles and spacecraft) is already heavily impacted by REACH in general and REACH Article 33 in particular.<sup>3</sup> The sector is fully committed and has been working since the adoption of REACH on company and sector-level to address the REACH impacts and ensure continued compliance efficiently. Whereas it is clear that REACH does apply to the Space Sector, it is also clear that **EU waste rules do - by definition - not cover objects that do not result in “waste”<sup>4</sup> on the EU territory.** This is the special case for the Space Sector as producer of equipment designed to be sent into space, such equipment is therefore **not part of the Circular Economy** (see also <https://euospace.org/reach-waste-october2018>):

The **supply chain ends** at the launch site (for example in EU at Centre Spatial Guyanais (CSG), the European spaceport and launch facility near Kourou in French Guiana).<sup>5</sup> Subsequently a change of legal regime takes place as space activities are governed by international agreements<sup>6</sup> and national space law.<sup>7</sup> The **space law framework** contains specific and very stringent rules and safety requirements, including provisions in case of the Return of Objects Launched into Outer Space and Space Debris Mitigation. At the end of their service life space systems are either **re-orbited (graveyard orbit above geosynchronous)** and **never come back** to Earth or they are **de-orbited. Spacecraft are now being designed for demise to maximise burn-up during descent through the atmosphere and controlled to come down above the southern Pacific.** Please see Addendum 1 on ‘*Space Debris Mitigation*’ for more information.

Never would any waste operator on Earth draw any benefit from the respective database contents as envisaged by the Commission and ECHA (see the mentioned non-paper, enclosed as Annex 3).

**Therefore, ASD-Eurospace is of the opinion that the notification duty under Article 9(1)(i) of the revised Waste Framework Directive 2008/98/EC does not apply to equipment designed to be sent into space and related means of transport (launch vehicles and spacecraft, such as satellites for telecommunication, navigation or space exploration) which do not result in “waste” on the EU territory. While an explicit ‘exemption’ for space products is not foreseen in the Directive, such products – not being part of the Circular Economy – are considered to fall outside the scope of the Directive. This interpretation should apply uniformly across EU Member States, because supply chains are very complex and transnational. Besides, any notification (e.g. for ground equipment) should not go beyond REACH Article 33(1) data.**

<sup>3</sup> See [Eurospace Space Sector contribution to the EC REACH Review 2017](#), especially “Difficulties to comply with REACH Article 33” (page 7-8) and “Substances in complex articles: Workable approach” (page 9).

<sup>4</sup> ‘Waste’ means any substance or object which the holder discards or intends or is required to discard, Article 3 No. 1 of Directive 2008/98/EC.

<sup>5</sup> Alternatively spacecraft produced in EU may also be launched from non-EU launch sites or subsystems and equipment produced by EU space companies are supplied to non-EU satellite producers who operate under a different space law framework. However, end-of-life considerations for these objects post launch as given in this document are similar to spacecraft launched from CSG.

<sup>6</sup> See [United Nations Treaties and Principles On Outer Space, related General Assembly resolutions and other documents \(ST/SPACE/61\)](#).

<sup>7</sup> Concerning launches from CSG (launcher and spacecraft), the French Space Act ([Loi n° 2008-518 du 3 juin 2008 relative aux opérations spatiales](#) – « L.O.S. ») applies (fully applicable for all launches after 01/01/2021).

**EUROSPACE REQUEST TO MINISTRIES / AUTHORITIES IN CHARGE OF WFD**

Eurospace has asked the European Commission (DG Environment) with letter of 8 October 2018 for a legal clarification confirming our opinion, given the excessive wording of Article 9(1)(i) with regard to the legal scope of EU waste rules in general and Article 9 of Directive (EU) 2018/851 in particular. The Commission replied with letter of 14 June 2019 (Ref. Ares(2019)3807153-14/06/2019) that the Directive “*does not foresee any exemptions from this [notification] rule*” (see Commission reply enclosed as [Annex 1](#)). While this is not disputed, Eurospace considers that the mentioned space equipment is already **outside the scope** of the revised WFD and its Article 9, hence notifications should not be required (see also Eurospace response to the Commission enclosed as [Annex 2](#)). We believe that **this should be clarified** when transposing / implementing the Directive into national laws. Such clarification would serve the Union law principles of legal certainty, regulatory consistency (with RoHS<sup>8</sup>), proportionality and the EU’s space policy.<sup>9</sup>

On a separate note, any other interpretation would also raise serious concerns with regard to intellectual property rights, confidentiality requirements and the vital protection of the European Space Sector’s know-how on advanced space technologies. Furthermore, it could lead to serious conflicts with other national legislation and sovereign rights. Please see [Addendum 2](#) for more information.

**Therefore, we would herewith like to ask national Ministries / authorities in charge of transposing / implementing the revised Waste Framework Directive 2008/98/EC to take the Eurospace opinion into account when transposing the Directive into national laws (which is required by 5 July 2020), as well as for any subsequent enforcement. Given the need for a uniform approach across EU Member States we also encourage your coordination with other Member States’ authorities. Please inform Eurospace about your approach taken for due action by our member companies.**

We look forward to your response and are available for any further questions.

**Kind regards,**



*Pierre LIONNET*  
*Secretary General and Director of Research*  
*ASD-EUROSPACE*

E: [Pierre.lionnet@eurospace.org](mailto:Pierre.lionnet@eurospace.org)

T: +33-(0)1 44 42 00 70

See also [Addendum 3](#) for **translations** of this Eurospace position with the request to Member States.

---

<sup>8</sup> “*Equipment designed to be sent into space*” as well as “*means of transport for persons or goods*” are explicitly excluded from the scope of Directive 2011/65/EU (RoHS Article 2 (4) (b) and (f)). RoHS supplements the general Union waste management legislation, such as Directive 2008/98/EC (RoHS Recital (11)).

<sup>9</sup> [https://ec.europa.eu/growth/sectors/space\\_en](https://ec.europa.eu/growth/sectors/space_en). In its “Space Strategy for Europe” of 26 October 2016 the European Commission proposed a number of actions to maintain Europe’s autonomous access to space.

## ADDENDUM 1. OUTLINE OF SPACE DEBRIS MITIGATION (“SDM”) REQUIREMENTS

### Space law framework

European Space Agency (ESA) space systems follow the “*United Nations Treaties and Principles On Outer Space, related General Assembly resolutions and other documents*” (ST/SPACE/61).<sup>8</sup> They include provisions on the Return of Objects Launched into Outer Space<sup>10</sup> and Space Debris Mitigation (“SDM”).<sup>11</sup>

SDM requirements are intended to reduce the growth of space debris by ensuring that spacecraft and launch vehicle orbital stages are designed, operated and disposed of in a manner that prevents them from generating debris throughout their orbital lifetime for the purpose of collision avoidance and the protection of population during re-entry. Concerning European launchers, and for ESA space systems launched from CSG, Europe’s spaceport located on the French territory, the French Space Act (Loi n° 2008-518 du 3 juin 2008 relative aux opérations spatiales – « **L.O.S.** ») applies,<sup>9</sup> together with its associated technical regulation “*Arrêté du 31 mars 2011 relatif à la réglementation technique en application du décret n° 2009-643 du 9 juin 2009 relatif aux autorisations délivrées en application de la loi n° 2008-518 du 3 juin 2008 relative aux opérations spatiales*” (available at <https://www.legifrance.gouv.fr>). As such, the L.O.S. requires that any space object follows safety requirements and any space object is subject to retrieval as much as possible. ESA has issued its first SDM policy in 2008 (updated in 2014). At the international level an ISO standard **ISO 24113:2011** “*Space systems -- Space debris mitigation requirements*” of May 2011 has been proposed.

### Most space systems are not returning to Earth

Spacecraft, and parts thereof, are generally burned in the atmosphere and do not result in waste. *Interplanetary probes* stay in deep space or are de-orbited in another planet. *Geostationary satellites* (“GEO” region ≈ 36000km altitude) are in end of life re-orbited to the graveyard orbit (+300km) and never come back to earth. Also *Low Earth Orbit satellites* (“LEO” region 0 - 2000km altitude) typically burn at end of life in the atmosphere. Equally, *Launch stages* de-orbited are expected to burn when returning through the atmosphere, by requirement and design.

### Re-entry of spacecraft and launch vehicle orbital stages

Launch vehicle main stages return into the sea and not on mainland (thus not on EU territory). Those items do not remain on the water surface, following international waters principles. For future launchers, reusability is even a key criterion in the design, but so far not applied for European launchers.

Other space objects that fall back down to Earth (never on EU territory) are recovered and recycled **within the Space Sector**. Since the start of European Space programmes at ESA, the policy has been to recover any unburned space object falling down to Earth (soil or sea) whenever possible, for controlled re-entry; for people’s safety, return of experience and confidentiality reasons. Any such object is sent back to space industry for expertise and treatment, and is hence not considered as waste.

---

<sup>10</sup> *Agreement on the Rescue of Astronauts, the Return of Astronauts and Return of Objects Launched into Outer Space*, adopted by the General Assembly in its resolution 2345 (XXII) of 19 December 1967.

<sup>11</sup> *Space Debris Mitigation Guidelines of the Committee on the Peaceful Uses of Outer Space*, endorsed by the Committee on the Peaceful Uses of Outer Space at its fiftieth session and contained in A/62/20, annex.

For those elements surviving re-entry through the atmosphere, specific measures are defined. In the case of “**controlled re-entry**” remaining unburned parts<sup>12</sup> will target a point in the ocean, as for stages of launchers. When re-entry is at sea, the objective is not to create floating wrecks on sea surface in order not to endanger maritime traffic. There are two sub-cases: **When recovery is part of the mission**, the space object (and/or space fragments) is recovered by a specific planned procedure by sea, air or terrestrial means, to be carried out by operators pre-defined in the mission. **When recovery is not possible** at sea, specific measures are foreseen to sink the space object into the ocean, following international waters principles which foresee not to leave any object at the sea surface which could endanger maritime traffic in international waters ([United Nations Convention on the Law of the Sea](#)).

---

<sup>12</sup> Without a specific design, examples of unburned parts are: Titanium tanks, Ceramic mirrors, heavy rods or bars (i.e. magnetorquers), reaction wheels, etc.

## ADDENDUM 2. IMPLICATIONS OF ECHA DATABASE INCLUSION FOR SPACE PRODUCTS

According to the present position equipment designed to be sent into space and related means of transport which do not result in waste on the EU territory are considered to fall outside the scope of the Waste Framework Directive. This conclusion is also evident when briefly looking at the manifold and complex implications of an assumed inclusion of space products in the WFD notification/database.

Following the Commission's non-paper on WFD of 20 June 2019,<sup>13</sup> the draft ECHA "Detailed Information Requirements" for the WFD database go far beyond the data to be communicated pursuant to REACH Article 33(1) – **with special regard to the waste stage**. In the case of products containing some of multiple SVHCs above 0.1% w/w, the notification would essentially resemble a comprehensive bill of materials (BOM), where the supplied product structure is to be broken down from the highest assembly level to the next ones, until the component containing the candidate list substance is identified.<sup>14</sup>

Such a wide scope of information to be notified (BOM's disclosure incl. substances, component localisation, article reference, etc.) and held in the ECHA database for access by third parties could lead to the transmission of any business sensitive production information and the publication of confidential product data. Hence, there would be a severe danger of industrial espionage (e.g. for unauthorised reproduction of satellites and launchers, image analyse algorithm, secured communications) and regulation being used as a competitiveness hindrance tool. The space domain is the most constrained (but aviation, defence and intelligence face similar issues).

More specifically it was reported by WFD Task Force members that *in France* BOMs for space and intelligence products are subject to the protection of the national scientific and technique inheritance ('PPSTN'<sup>15</sup>);<sup>16</sup> **they can't be shared even internally, and shall only be managed in restricted areas under specific security rules**. Around 80% of French Defence and Space activities are subject to specific regulations to restrict diffusion of information outside of French legal entities or limiting the right to disseminate information shared with other countries, based on non-disclosure agreements, global contracts etc.

WFD Task Force members also reported that the disclosure of BOMs in the ECHA database may be subject to **Export Control** requirements, at least for part of their content which is also in DML, DPL and MMPP, provided that the project itself is subject to Export Control.<sup>17</sup> With regard to Satellites, some satellite systems are for defence only (military goods) while others are used both for defence and civil purposes (**dual use**).

---

<sup>13</sup> See [Footnote 2](#) above.

<sup>14</sup> See also the Chemical Watch article of 24 July 2019 "REACH & CLP Hub Echa's new waste framework Directive database – mission impossible?", available at <https://chemicalwatch.com/79896> and <https://www.reachlaw.fi/wp-content/uploads/2019/08/pdf-reach-clp-hub-echas-new-waste-framework-directive.pdf>.

<sup>15</sup> Acronym for the French "Protection du Potentiel Scientifique et Technique de la Nation".

<sup>16</sup> The applicable legal text for PPSTN (in French) can be found at <https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000026140136&categorieLien=id>.

<sup>17</sup> DML: Declarable Material List; DPL: Declarable Process List; MMPP: Material Manufacturing Parts Process.

Their breakdown and disclosure in the ECHA database could thus collide with national defence and security interests, as well as with Export Control laws, e.g. Council Regulation (EC) No 428/2009 of 5 May 2009 setting up a Community regime for the control of exports, transfer, brokering and transit of dual-use items.<sup>18</sup>

In accordance with Article 2(3) of the REACH Regulation, where necessary, in the interests of defence Member States may allow for exemptions from the REACH Regulation in specific cases for certain substances on their own, in a mixture or in an article.

The Commission, in its non-paper on WFD of 20 June 2019<sup>19</sup>, has clarified that *“in case a Member State considers that the reporting obligations are detrimental to its national interests in the area of defence, that Member State may choose to invoke this article (i.e. Article 2(3) of the REACH Regulation) to provide a specific exemption from the obligation of Article 33(1) of REACH, and to Article 9(1)(i) of the WFD respectfully”*.

It has to be noted that, as of today the defence exemption under REACH Article 2(3), due to its clear and strict relevance to national interests of defence, cannot be used outside the defence domain, i.e. for civil applications, while it is not clear whether REACH Article 2(3) may apply in the interest of security.<sup>20</sup>

The Commission, in its non-paper on WFD of 20 June 2019<sup>21</sup>, has also clarified that *“Member States are not obliged to supply information the disclosure of which they consider to be contrary to the essential interests of its security (Article 346 of the Treaty for The Functioning of the EU (TFEU)).”*

It is for the Member States to conciliate such interests (e.g. the aforementioned national essential security interests) when transposing EU Directives such as the present revised WFD and its Article 9.

---

<sup>18</sup> See legal text at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32009R0428>.

<sup>19</sup> See footnote 2 above.

<sup>20</sup> See Study on the Impact of REACH and CLP European Chemical Regulations on the Defence Sector, page 16, findings under points 9 and 10; available at the [European Defence Agency \(EDA\) website](#).

<sup>21</sup> See footnote 2 above.

**ADDENDUM 3. SUMMARY OF EUROSPACE POSITION & REQUEST TO MEMBER STATES**

This Appendix provides a summary of the Eurospace position and request to Member States in English, together with key translations of the summary to ease communication at the national level. For the full content reference is made to the core text, Addendum 1 and 2 (p. 1-7 of this document).

**ENGLISH**

ASD-Eurospace is of the opinion that the notification duty under Article 9 (1) (i) of the revised Waste Framework Directive 2008/98/EC does not apply to equipment designed to be sent into space and related means of transport (launch vehicles and spacecraft, such as satellites for telecommunication, navigation or space exploration) which do not result in “waste” on the EU territory. While an explicit ‘exemption’ for space products is not foreseen in the Directive, such products – not being part of the Circular Economy – are considered to fall outside the scope of the Directive. This interpretation should apply uniformly across EU Member States, because supply chains are very complex and transnational. Besides, any notification (e.g. for ground equipment) should not go beyond REACH Article 33(1) data.

We would like to ask national Ministries / authorities in charge of transposing / implementing the revised Waste Framework Directive 2008/98/EC to take the Eurospace opinion into account when transposing the Directive into national laws (which is required by 5 July 2020), as well as for any subsequent enforcement. Given the need for a uniform approach across EU Member States we also encourage your coordination with other Member States’ authorities. Please inform Eurospace about your approach taken for due action by our member companies.

**FRENCH**

ASD-Eurospace est d'avis que l'obligation de notification prévue à l'article 9, paragraphe 1, point i), de la directive-cadre sur les déchets révisée 2008/98 / CE ne s'applique pas aux équipements conçus pour être envoyés dans l'espace et aux moyens de transport associés (lanceurs et engins spatiaux, tels que les satellites de télécommunication, de navigation ou d'exploration spatiale) qui ne génèrent pas de «déchets» sur le territoire de l'UE. Bien qu'une "exemption" explicite pour les produits spatiaux ne soit pas prévue dans la directive, ces produits - ne faisant pas partie de l'économie circulaire - sont considérés comme ne relevant pas du champ d'application de la directive. Cette interprétation devrait s'appliquer uniformément dans les États membres de l'UE, car les chaînes d'approvisionnement sont très complexes et transnationales. En outre, aucune notification (par exemple, pour les équipements au sol) ne doit aller au-delà des données de l'article 33 (1) de REACH.

Nous voudrions demander aux ministères / autorités nationaux chargés de la transposition / la mise en œuvre de la directive-cadre 2008/98 / CE sur les déchets révisée, de prendre en compte l'avis d'Eurospace lors de la transposition de la directive dans la législation nationale (obligatoire au plus tard le 5 juillet 2020), ainsi que pour toute exécution ultérieure. Étant donné la nécessité d'une approche uniforme dans tous les États membres de l'UE, nous encourageons également votre coordination avec les autorités des autres États membres. Veuillez informer Eurospace de votre démarche afin que nos sociétés membres puissent agir comme il convient.



**GERMAN**

ASD-Eurospace ist der Auffassung dass die Mitteilungspflicht gemäß Artikel 9 Absatz 1 (i) der geänderten Richtlinie 2008/98/EG über Abfälle nicht für Ausrüstungsgegenstände für einen Einsatz im Weltraum sowie damit verbundene Transportmittel (Trägerraketen und Weltraumfahrzeuge wie z.B. Satelliten für die Telekommunikation, Navigation oder Weltraumerforschung) gilt, welche nicht in "Abfall" auf dem Gebiet der EU resultieren. Während eine ausdrückliche Ausnahmenvorschrift für Raumfahrtprodukte in der Richtlinie fehlt, werden solche Produkte – die nicht Teil der Kreislaufwirtschaft sind – als außerhalb des Anwendungsbereichs der Richtlinie befindlich angesehen. Diese Auslegung sollte einheitlich in den EU-Mitgliedstaaten gelten, da die Lieferketten sehr komplex und grenzübergreifend sind. Im Übrigen sollte jegliche Mitteilungspflicht (z.B. für Bodenausrüstung) nicht über die nach REACH Artikel 33 Absatz 1 zu liefernden Informationen hinaus gehen.

Wir möchten hiermit die für Umsetzung und Vollzug der geänderten Richtlinie 2008/98/EG über Abfälle zuständigen nationalen Ministerien / Behörden bitten, die Auffassung von ASD-Eurospace bei der Umsetzung der Richtlinie in nationales Recht (die bis zum 5. Juli 2020 erforderlich ist) sowie für den darauf folgenden Vollzug zu berücksichtigen. In Anbetracht des Erfordernisses einer einheitlichen Handhabung in den EU-Mitgliedstaaten möchten wir Sie auch zur Koordinierung mit den Behörden anderer Mitgliedstaaten anhalten. Bitte informieren Sie Eurospace über Ihren gewählten Ansatz zum Zwecke des gebührenden Handelns unserer Mitgliedsunternehmen.

**ITALIAN**

ASD-Eurospace ritiene che l'obbligo di notifica ai sensi dell'articolo 9, paragrafo 1, lettera i), della Direttiva 2008/98/CE e sue successive modifiche, sulla riduzione degli impatti negativi della produzione e della gestione dei rifiuti, non si applichi alle apparecchiature progettate e destinate ad essere inviate nello spazio ed ai relativi mezzi di lancio (razzi vettori e veicoli spaziali, i satelliti per le telecomunicazioni, la navigazione o l'esplorazione dello spazio con o senza astronauti) in quanto non producono "rifiuti" sul territorio dell'UE. Sebbene nella Direttiva non sia prevista una "esenzione" esplicita per i prodotti spaziali, tali prodotti - non facenti parte dell'economia circolare - dovrebbero considerarsi esclusi dal campo di applicazione della direttiva. Questa interpretazione sarebbe applicabile in modo uniforme in tutti gli Stati membri dell'UE, poiché le catene di approvvigionamento sono molto complesse e transnazionali. Inoltre, qualsiasi notifica (ad es. per apparecchiature di uso a terra) non dovrebbe andare oltre i dati REACH ai sensi dell'articolo 33, paragrafo 1.

Vorremmo chiedere ai Ministeri / Autorità Nazionali incaricati di recepire / attuare la Direttiva quadro sui rifiuti 2008/98/CE, e sue successive modifiche, nelle Legislazioni Nazionali (richiesta entro il 5 luglio 2020), di tenere conto del parere di Eurospace, nonché per qualsiasi ulteriore applicazione. Data la necessità di un approccio uniforme in tutti gli Stati membri dell'UE, auspichiamo anche il vostro coordinamento con le autorità degli altri Stati membri. Si prega di informare Eurospace dell'approccio seguito per le dovute azioni da mettere in atto dalle nostre Società associate.

## SPANISH

ASD-Eurospace es de la opinión de que la obligación de notificación en virtud del Artículo 9 (1) (i) de la Directiva revisada de Residuos 2008/98 / CE no se aplica a los equipos diseñados para ser enviados al espacio y medios de transporte relacionados (vehículos de lanzamiento y naves espaciales, como los satélites para telecomunicaciones, navegación o exploración espacial) que no generan "residuos" en el territorio de la UE. Si bien no se prevé una "exención" explícita para los productos espaciales en la Directiva, se considera que dichos productos, que no forman parte de la Economía Circular, quedan fuera del alcance de la Directiva. Esta interpretación debería aplicarse de manera uniforme en todos los Estados miembros de la UE, porque las cadenas de suministro son muy complejas y transnacionales. Además, cualquier notificación (por ejemplo, para equipos de tierra) no debe ir más allá de los datos suministrados en aplicación del Artículo 33 (1) de REACH.

Quisiéramos pedir a los Ministerios / autoridades nacionales a cargo de la transposición / implementación de la Directiva revisada 2008/98 / CE sobre residuos que tengan en cuenta el dictamen de Eurospace al transponer la Directiva a las leyes nacionales (que debe de hacerse antes del 5 de julio de 2020), como así como para cualquier aplicación posterior. Dada la necesidad de un enfoque uniforme en todos los Estados miembros de la UE, también alentamos su coordinación con las autoridades de otros Estados miembros. Nos gustaría que informara a Eurospace acerca de cuál va a ser su actitud con respecto a esta petición para la debida acción de nuestras empresas miembro.

*End of Addendum 3*

## CONTRIBUTORS

This paper has been prepared in the frame of the WFD Task Force, a splinter group of the Materials and Processes Technology Board of the European Space Components Coordination (ESCC MPTB).<sup>22</sup> The ESCC MPTB is a partnership between the European Space Agency (ESA), national space agencies, and space industry represented by ASD-Eurospace; it is chaired at present by ESA. Current participants from Eurospace include: Airbus Defence & Space, ArianeGroup, Avio, MT Aerospace, OHB, RUAG, TESAT and Thales Alenia Space. Participating national space agencies are: Agenzia Spaziale Italiana (ASI), Centre National d'Etudes Spatiales (CNES) and Deutsches Zentrum für Luft- und Raumfahrt e.V. (DLR). Other participants are MAP, a manufacturer of mixtures, REACHLaw, a consultancy supporting the group on REACH and other chemical regulations, and the European Defence Agency (EDA) as observer.

---

<sup>22</sup> See <https://eurospace.org/new-space-industry-task-force-to-address-the-eus-revised-waste-framework-directive>.